

DARNELL MASTERSON

(Plaintiff-Claimant)

STATE OF INDIANA

COUNTY OF ALLEN

VS.

International Leadership School

[Defendant(s)]

Cause No. 02003-2308-PL-000347

(to be provided by the Court)

Abdulwahab Abashaar

(School Principal)

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AND SUPERIOR COURT
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AND SUPERIOR COURT

COMPLAINT

Comes Now, Darnell Masterson, pro-se, and in propria persona, sui juris, and makes this claim against the above Defendant(s), International Leadership School, hereafter referred to as "ILS" and Abdulwahab Abashaar, hereafter referred to as Abashaar. He does so against both ILS, as an educational entity, and employer subject at all times to Indiana EEOC guidelines and regulations and against Abashaar, in his capacity as Principal of the school and head administrator, and in his individual capacity as well. Masterson's pursues this claim against the defendants pursuant to compensatory and punitive damages as a former employer of such arising out of a Bad Faith Refusal to pay or Settle a Claim when offered (See Attachment Exhibit A) when obvious violations against Plaintiff took place.

Masterson respectfully pursues his claim against the above named for the incident(s) occurring to Masterson, on August 16 2021, and at various other ongoing times while in employment with ILS.

JURISDICTION:

This Honorable Court has Jurisdiction in this matter pursuant to Title 7 & its prohibition against employment discrimination & Title 28: U.S. 1331 and 1334(a)(3)

Parties:

Därnell Masterson is an adult person residing in the county of Allen in the State of Indiana.

International Leadership School is both a business and educational operation within Allen County and in the State of Indiana located at 6413 N. Clinton St 46825

Abdulwahab Abashaar operated in the state of Indiana and the County of Allen in both his professional and personal capacity as principle of the International Leadership School

Factual Analysis & History:

(1) Masterson was hired to work at ILS on (07/15/2021) to work within the capacity as both a Teachers Aid & Bus Driver.

(2) However, within 2 weeks, Masterson was relegated to doing mostly maintenance & janitorial work.

(3) Masterson had worked as a teacher's aid initially and established a great working relationship

with the children at the School, but nevertheless daily, his duties within a 2-week period, became almost exclusively janitorial and maintenance in nature.

(4) Masterson brought this to school teacher Abashaar's attention and even told him he believed that such was being done to him because he was **a large black male and a Buddhist** (keep in mind that (The International Leadership School) is a Muslim American learning Academy, Abashaar rather than taking his concerns seriously brushed them off and insisted that he should be grateful to have a job and to return to his janitorial duties.

(5) Masterson was subsequently released (on August 16th 2021) approximately 30 days of employment with the International Leadership School by Abashaar (School principal) and told that the reason was for what came back on his background check, which Masterson **never gave Abashaar written permission to** or anyone else associated with ILA (as required by law) to do so.

Cause of Action

Masterson brings this action against ILS and Abashaar

(1) for wrongful acts and breach of contract.

(2) Discrimination based on race, gender, and religion

(3) For running an Unlawful non-permissible background check as required by FCRA law.

(4) Masterson maintains that his termination was religiously and racially motivated and that "the

background check was simply a ruse to circumvent the true prejudicial reasons for his ultimate dismissal..

....
(5) And in violation of Section 7 of the Privacy Act of 1974 wherein Masterson did not give his Social Security Number as his right under the above Privacy Law this was also given as a reason for his termination.

"It shall be unlawful for any Federal, State or local government agency to deny to any individual any right, benefit, or privilege provided by law because of such individual's refusal to disclose his social security account number." Sec. 7(a)(1)

....
Masterson humbly requests this honorable court for all just & proper relief in the premises as a result of the above cited violations.

CERTIFICATE OF SERVICE

I certify that on the 16th day of August 2023, I served a copy of the foregoing upon the International Leadership School & Abdulwahab Abashaar [via 1st Class Certified Mail located at 6413 North Clinton st. Fort Wayne Indiana.

x Darnell Masterson

Darnell Masterson

OATH OF AFFIRMATION

I, Darnell Masterson, do solemnly swear and attest that the above is true & correct to the best of knowledge and ability. Sworn on this day of August 16th, 2023

x Darnell Masterson

Darnell Masterson